

RECD IN PRO SE OFFICE
JAN 13 25 PM 4:53

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Dashawn A. LaRode X

Plaintiff(s),

AFFIRMATION OF SERVICE

-against-

GEORGE BADEEN dba
ALLIED FINANCE ADJUSTERS/
NYCR INDUSTRIES Defendant(s).
CORP.

24 -CV- 8622 (HG) ()

X

I Sage El

, declare under penalty of perjury that I have
served a copy of the attached Motion for Default Judgment Affirmation
in support of motion for Default Judgment
upon George Baden

by mailing it to USPS Certified # 9589071052701132091383

whose address is: 70 Plain Avenue, New Rochelle, NY, 10801,
NYCR Industries Corp.

Dated: 01-13, 2025
Central Islip, New York

By: Sage El
Signature

c/o: 388 East 498 street
Address

Brooklyn, New York republic
City, State & Zip Code
[11203]

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

(2)

-----X
Dashawn A. LaRode, Plaintiff(s),
-against-
GEORGE BADEEN, dba ALLIED
FINANCE ADJUSTERS / NYCR INDUSTRIES, Defendant(s).
-----X

MOTION FOR
DEFAULT JUDGMENT

24 CV-~~8662(11G)~~
24-CV-8622-HG

Plaintiff Dashawn LaRode hereby moves the Court pursuant to Federal Rule of Civil Procedure 55 (b) and Local Civil Rule 55.2 to enter default judgment in favor of plaintiff and against defendant(s) George Badeen on the grounds that said defendants(s) failed to answer or otherwise defend against the complaint.

Dated:

By. Dashawn L
(Signature)

By. Dashawn A. LaRode
Print Name of Plaintiff Pro Se

151 Grafton Street
Address

Brooklyn, New York republic [11212]

TO: (Put Name and Address of
Each Defendant(s) or Defense Attorney)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-X

Dashawn A. Lahode,

AFFIRMATION IN SUPPORT
OF MOTION FOR DEFAULT
JUDGMENT

Plaintiff(s)

GEORGE ^{-against-} BADEEN, dba ALLIED

24 CV-8622 (HG)

FINANCE ADJUSTERS/NYCR INDUSTRIES CORP.

Defendant(s).

-X

I, Dashawn Lahode

hereby declares as follows:

1. I am the plaintiff in this action.
2. This action was commenced pursuant to 18 USC 894, 12 USC 83, 28 USC § 1331
FCRA, FDCPA
3. The time for defendant(s), 01-08-2025, to answer or otherwise

move with respect to the complaint herein has expired.

4. Defendant(s), George Badeen, has not answered or otherwise moved with respect to the complaint, and the time for defendant(s) George Badeen to answer or otherwise move has not been extended.

5. That defendant(s) George Badeen default has been noted by the Clerk of Court. A copy of the Certificate is attached hereto.

6. Defendant(s) George Badeen is indebted to plaintiff, I, Dashawn Lahode, in the following manner (state the facts in support of the claim(s)):
On December 5, 2024, George Badeen in conjunction with NYCR Industries Corp; wrongfully repossessed my MDX Acura 2024. This constitute Actual damage in the amount of \$10000.00 pursuant to (15 USC §§ 1681n(a)(1), 1681o(a)(1), and 1692 k(a)(1);

Statutory damages in the amount of \$5,000,000.00 pursuant to
(15 USC §§ 1681n(a)(1) and (1692k(a)(2)(A)).

Punitive damages in the amount of \$30,000,000.00 pursuant
to (15 USC § 1681n(a)(2). And reasonable attorney's fees and
cost in the amount of \$65,000.00 pursuant to (15 USC 1681n
(a)(3), 1681o(a)(2) and (1692k(a)(3).

WHEREFORE, plaintiff Dashawn LaRode requests that a default
judgment be entered in favor of plaintiff Dashawn LaRode and against
defendant(s) George Baden

I declare under penalty of perjury that the foregoing is true and accurate to the best of my
knowledge, information and belief, that the amount claimed is justly due to plaintiff, that no part
thereof has been paid, and that the disbursements sought to be taxed have been made in this
action or will necessarily be made or included in this action.

Dated: 01-13-2025

By: Dashawn L
(Signature)

By. Dashawn LaRode
(Print name)

c/o: 151 Grafton Street
(Address)

Brooklyn, New York republic

11212